

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Jorge Colon	:	
	:	Case No.: 18-12337-MDC
	:	
Debtor(s)	:	Chapter 13

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF
AUTOMATIC STAY FILED BY SELECT PORTFOLIO SERVICING, INC**

COMES NOW, Debtors, Jorge and Denise Colon, hereinafter referred to as “Debtors,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by LSF9 Master Participation Trust by Caliber Home Loans, Inc., “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Denied.
6. Denied.
7. Denied. By way of further response, it is specifically requested that the undersigned Counsel be provided with a complete post-petition payment history.
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Dated: December 18, 2019

Respectfully submitted,

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.

Attorney for the Debtor

Sadek & Cooper

1315 Walnut Street, #502

Philadelphia, PA 19107

(215) 545-0008